

EXHIBIT E

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

Rio Tinto plc

Plaintiff,

v.

Vale, S.A., Beny Steinmetz, BSG Resources Limited, BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd, BSGR Guinea Ltd. BVI, BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL aka VBG-Vale BSGR Guinea, Frederic Cilins, Michael Noy, Avraham Lev Ran, Mamadie Touré, and Mahmoud Thiam,

Defendants.

Civil Action No. 1:14-CV-03042-RMB-MHD

RIO TINTO PLC'S RULE 26(A)(1) INITIAL DISCLOSURES

Pursuant to Federal Rule of Civil Procedure 26(a)(1), and based upon the information currently and reasonably available to it, Plaintiff Rio Tinto plc ("Plaintiff"), hereby makes the following initial disclosures on Defendants Vale, S.A., Beny Steinmetz, BSG Resources Limited, BSG Resources (Guinea) Ltd. aka BSG Resources Guinée Ltd, BSGR Guinea Ltd. BVI, BSG Resources Guinée SARL aka BSG Resources (Guinea) SARL aka VBG-Vale BSGR Guinea, Frederic Cilins, Michael Noy, Avraham Lev Ran, Mamadie Touré, and Mahmoud Thiam (collectively, the "Defendants").

A. WITNESSES

Plaintiff identifies the following witnesses as likely to have discoverable information that Plaintiff may use to support its claims and/or defenses in this action, along with their possible subjects of testimony. Plaintiff reserves the right to supplement or amend this witness disclosure

pursuant to Rule 26(e) if additional witnesses or subjects are identified.

No.	Name	Address	Subject
1	Mike Harris Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
2	Marius Verwoerd Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
3	Ken Haddow Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
4	Peter Lello Galassi Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's investigations and studies regarding various port locations related to the development of Simandou.

5	Richard Taylor Rio Tinto plc	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Rio Tinto's research, exploration and development of mining operations at Simandou, meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
6	Kerryl Bradshaw Rio Tinto	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.
7	Peter Cunningham Rio Tinto	c/o Eric C. Lyttle QUINN EMANUEL URQUHART & SULLIVAN, LLP 777 6 th St. NW, 11 th Floor Washington, DC 20001	Negotiations and meetings between Rio Tinto and Vale regarding a potential joint venture at Simandou, and information and documents provided to Vale during those negotiations and meetings.

In addition to those individuals identified above, Plaintiff hereby incorporates by reference any witnesses and their possible subjects of testimony disclosed by Defendants in their Initial Disclosure Statements pursuant to Federal Rule of Civil Procedures 26(a).

B. DOCUMENTS

Based on information currently and reasonably available to Plaintiff, set forth below are categories of documents and the location of documents that Plaintiff may use to support its claims or defenses in this action. Plaintiff will produce the identified documents on request at a

mutually agreeable time and place, subject to any necessary protective order or confidentiality designation. Plaintiff reserves the right to use additional documents at trial. Plaintiff further reserves the right to supplement or amend this disclosure pursuant to Rule 26(e) if additional categories of documents are identified.

1. Rio Tinto's research and development of mining operations at Simandou, including but not limited to, geological and technical information, product characteristics, suitable mining methods and drilling operations, processing and logistics including the viability of different transportation options, and the status of efforts to bring Simandou into production.
2. Negotiations between Rio Tinto and Vale related to a potential joint venture at Simandou.
3. The Guinean Government's rescission of Rio Tinto's interest in Blocks 1 and 2 of Simandou and subsequent assignment of that interest to Defendants.
4. The Vale-BSGR joint venture related to Simandou Blocks 1 and 2.
5. Governmental investigations relating to Defendants' acquisition of Simandou Blocks 1 and 2.

The above documents are located at the following Rio Tinto offices: 2 Eastbourne Terrace, London, W2 6LG, United Kingdom 020 7781-2000; 17 place des Reflets, 92097 Paris, La-Défense Cedex, France; 153-158 St. George's Terrace, Perth Australia 6000.

C. DAMAGES COMPUTATION

The amount and type of damages in this matter are undetermined at this time. However, at this time, Plaintiff seeks compensatory, consequential, exemplary and punitive damages, and treble damages pursuant to 18 U.S.C. § 1964(c), as well as attorneys' fees and all costs associated with this matter.

D. INSURANCE AGREEMENTS

Plaintiff is not aware of any insurance agreement whereby an insurance company may be

liable to satisfy all or part of any judgment that may be entered in this matter or be used to indemnify or reimburse payments used to satisfy any judgment.

CONCLUSION

Discovery between the Parties concerning the claims at issue in this matter is not complete. Plaintiffs submit the forgoing Initial Disclosures based on information reasonably available to them and reserve the right to amend or supplement its Initial Disclosures, pursuant to Rule 26(e), as discovery and investigations continue.

Dated: New York, New York
June 23, 2014

Respectfully Submitted,

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